

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**PERIPHERAL VASCULAR ASSOCIATES, P.A.'S
PROPOSED VOIR DIRE**

Defendant Peripheral Vascular Associates, P.A. (“PVA”) hereby submits its proposed questions for it to ask the prospective jurors. In addition to, or instead of, many of the following questions, PVA respectfully requests that the Court direct the Clerk to provide a jury questionnaire to the prospective jurors. PVA and Relators are working on a proposed agreed list of questions for the jury questionnaire.

PROPOSED VOIR DIRE QUESTIONS

1. Do you or an immediate family member have training or work experience in the medical, health care, or health insurance fields? If so, please explain, including whether it was providing treatment, billing or record keeping, or a sales job.
2. Have you or anyone in your immediate family had a problem with a doctor, a nurse, or some other health care professional? If so, please explain, including whether you sued or considered suing them.
3. Have any of you suspected or accused a health care worker of creating a false medical or billing record? If yes, please explain.

4. Do any of you believe that health care professionals somehow abuse the health care system in the United States? If yes, please explain.
5. Do you or an immediate family member have training or work experience in human resources? If so, please explain.
6. Is there anybody here who thinks an organization involved in the business of health care should be able to rely on the expertise and medical judgment of doctors when making decisions about their business? If not why not?
7. Have you ever been investigated by a federal agency for any reason?
8. Have you or a former work colleague, friend, relative, or spouse ever been the target or the subject of a government investigation?
9. Have you ever volunteered, been employed, or applied for work in any law enforcement or security agency?
10. Do you have any professional or educational training or experience related to Medicare claims, medical billing, medical imaging, vascular medicine or a related field?
11. Is there anyone who believes a company is not allowed to make money, or if they make a lot of money, they something wrong? If not, why do you think that?
12. Does anyone feel that a person who provides services for another person is not entitled to be paid for those services?
13. Have any of you ever been a victim of fraud or do any of you have any friends or family members who have ever been a victim of fraud?
14. If so, who was the victim?

15. Please describe.

16. Was anybody punished for the fraudulent activity you just described?

17. Has anyone ever been in a discussion or expressed an opinion to anyone about the issue of health care fraud?

18. Have you or anyone close to you ever worked in an effort to change or enact a healthcare law? If so, please describe that effort and your level of participation.

19. Who has heard of the False Claims Act? What have you heard about it?

20. Does anyone feel that anyone who is accused of violating the False Claims Act is presumed or must be guilty?

21. Do you, anyone in your family, or anyone close to you currently receive benefits from a federal or state government healthcare program? Which Company?

22. Does anyone have experience with a vascular surgery practice (i.e., a doctor who specializes in treating peripheral artery disease, stroke, dialysis access, abdominal aortic aneurysms and venous disease)? If so, what was your experience?

23. Have any of you ever felt that something being done at your work was illegal or just morally wrong? If so, please explain, including whether anything was done about it.

24. Have you or an immediate family member been fired from a job? If so, please explain.

25. Excluding divorce cases, has anyone ever been a plaintiff, defendant, or witness in a legal proceeding? If yes, please explain.

26. Do any of you think that just because someone has stepped forward to file a “whistleblower” lawsuit on behalf of the Government and alleged that someone has defrauded the

Government, that there must be something to those allegations?

27. Does anyone believe that the mere fact that a lawsuit was filed cause you to think that the Defendant did something wrong?
28. Has anyone ever served on a jury? If yes, please describe the (1) type of case or cases, (2) whether the jury reached a verdict (without disclosing the nature of the verdict), and (3) whether you served as a foreperson or presiding juror.
29. Have you or an immediate family member received medical insurance from Medicare, Medicaid, TRICARE, or another government funded insurance program?
30. Has anyone been without health insurance at any point during the past five years?
31. Have you ever worked in a position where you were responsible for compliance with company or industry regulations? If yes, please explain.
32. During the past two years, have you had difficulty making ends meet?
33. Have you held a leadership position in any social, political, civic, or religious groups or organizations? If so, please explain.
34. In general, do you think that the damages awarded in lawsuits are: (1) too high; (2) about right; or (3) too low.
35. Some people are guided by their moral values, a moral compass, in the decisions they make. As jurors, the judge will tell you that you must follow the law and the instructions given to you, even if you do not agree with the law. Do you have any strong moral convictions that would prevent you from following the law and judge's instructions if you disagreed with the law or judge's instructions?
36. Would you put your own moral principles above the law if your personal convictions caused you to reach a different finding?

37. Is there any member of the panel who, for any reason not previously mentioned, could not sit as a fair and impartial juror in this case?